

4. "Inability Of Potential Brooks Customers To Obtain Service Information"**A. Payphone Contracts**

Contracts between the Ameritech Pay Phone Unit and the customer/premises owner are confidential and contain competitively sensitive information. With an appropriate letter of authorization, the Ameritech Pay Phone Unit will provide its competitors with verification of the existence of a contract and the date of contract expiration. Brooks can certainly obtain a copy of the contract from their customer. Alternatively, upon request, the Ameritech Pay Phone Unit will also provide duplicate contracts to its customer/premises owner, who can then provide a copy to Brooks.

Neither the Ameritech Pay Phone Unit or Ameritech Information Industry Services has a record of any request from Brooks Fiber for pay phone contracts or information for Cornerstone College or Ottawa Hills High School. In the case of Cornerstone College, the Ameritech Pay Phone Unit received a request from Brooks Fiber for disconnection of the four pay phones on the premises. Three of the four pay phones were not under contract and were disconnected on May 22, 1996. The fourth pay phone was disconnected based on the customer/premises owner's request on May 21, 1996.

With regard to Ottawa Hills High School, there were five pay phones located on the premises. There is no record of a request for contracts or information from Brooks. On August 29, 1996, three of the phones were disconnected for drug related reasons at the request of the customer/premises owner through its authorized distributor.

5. "Poor Coordination Of Customer Cutovers"

There is no question that coordination is essential to successful customer cutovers. But coordination necessarily involves two parties. It must be noted that Ameritech Michigan and Brooks Fiber have coordinated numerous customer cutovers (including several recent, large cutovers; two over 1,000 lines and one over 600 lines) in a flawless manner, with no adverse impact on the end user customer.

Ameritech has established the Network Element Control Center (NECC), formerly the Unbundling Service Center, for all provisioning, maintenance, repair, and cutover coordination with CLECs. This center is manned Monday through Friday from 6:30 a.m. to 12 midnight CST. After hours maintenance questions are handled by a "Fold Down Center," which is accessible to Brooks.

Ameritech's NECC works with the CLEC to establish specific dates and times for cutovers to ensure that coordination is scheduled and completed with concurrence from each CLEC. Although each situation may present unique circumstances, Ameritech estimates that a ten line conversion takes approximately one hour, which is reasonable, given the complexity of the task and the multiple vendors involved. Ameritech Michigan's representatives at the NECC have worked extensively with Brooks Fiber personnel to not only coordinate, but also to identify and correct errors in orders submitted by Brooks in connection with customer cutovers.

In one instance, a cutover involving 2,000 DID numbers, 30 POTS numbers being ported, and 2,080 lines being disconnected, Brooks submitted a single request, which had to be split by Ameritech personnel to reference multiple billing numbers and locations. The request also contained incorrect telephone numbers belonging to other customers and other incorrect information which

Ameritech personnel helped to correct. Brooks apparently desired a 5:00 p.m. cutover, but that was not indicated on the order, and Ameritech had to verbally ascertain scheduling.

In another instance involving 5,300 DID numbers being ported and 42 trunks being disconnected, Ameritech's NECC personnel not only identified errors in the original request, but brought in network experts who helped "pre-write" the necessary switch translation so that the cutover, which was scheduled at 12:00 a.m., could be completed faster, minimizing any customer inconvenience.

Another instance involved 1,750 DID numbers being ported for a local government agency. Ameritech's NECC personnel helped correct errors in the original request, initiated the use of internal control logs to ensure accuracy and timing of the cutover, initiated pre-testing of numbers prior to the day of cutover to ensure quality, and identified "critical" lines to be cut over first to minimize downtime.

These examples of extraordinary customer service provided to Brooks Fiber by Ameritech exemplify the coordination necessary on the part of both parties to accomplish cutovers with minimal disruption to the end user.

In the instance cited by Brooks Fiber (i.e., Crown Motors), the Brooks Fiber representatives attempted to accomplish a customer cutover during normal business hours with a customer that had heavy flows of traffic. A cutover requires that lines must be idle. Ameritech Michigan has consistently been willing to, and in fact has, worked with Brooks to accomplish cutovers after hours.

A technical proposal recently submitted by Brooks Fiber (Attachment 4 to the Brooks letter) was provided to Ameritech early in December. Clarification was required to understand the proposal and was received from Brooks on January 3, 1997. It appears that the request contemplates Ameritech Michigan

providing call forwarding features at no additional cost to Brooks Fiber to accomplish the cutover. Ameritech is reviewing the proposal.

6. "Improvements In Customer Service Commitments"

A. The Customer Comes First

Ameritech agrees with Brooks Fiber: "The Customer Comes First." Brooks Fiber representatives were again made aware of Ameritech's commitment to customers when this specific issue was discussed during the Brooks Fiber/Ameritech September 19, 1996 operations meeting. Ameritech advised Brooks Fiber in that meeting that if Brooks wished to ensure service continuity, it could not cut over lines that were in use at the time of the conversion.

B. Lack Of Sufficient Resources After Hours

As referenced in the Unbundling Product Guide provided to Brooks Fiber, the NECC has been established in Milwaukee, Wisconsin. It is a regional center, serving as a single point of contact for the provisioning and maintenance of unbundled products offered by Ameritech. As additional customers have come on line and work volumes have increased, the NECC's hours have been expanded from 7:00 a.m. - 7:00 p.m. CST, Monday through Friday, to 6:30 a.m. - 12:00 midnight CST, Monday through Friday. As previously described, after hours calls are handled by a Fold Down Center.

Also as referenced in the Unbundling Product Guide, Ameritech's normal working hours for field technicians are 8:00 a.m. - 5:00 p.m., Monday through Friday, excluding listed holidays. If a CLEC requests that overtime labor be performed at hours of the day or days of the week other than normal working hours, an additional charge, based on the additional costs involved, applies.

Ameritech will provide whatever resources are needed at whatever time requested by the CLEC.

C. Lack Of Professionalism

Ameritech shares Brooks Fiber's concerns regarding unprofessional conduct of Ameritech technicians. Ameritech has taken several measures to ensure its technicians understand the current competitive environment and the appropriate behavior in interacting with competitors' customers. The following have been reviewed with the technicians serving the Brooks Fiber areas:

- Videos explaining the current environment
- Pocket handouts
- Job Aids
- Face-to-face training
- Reinforcement videos

Ameritech is interested in any specifics Brooks may have on the situations referenced. Ameritech is working hard to ensure these situations referenced do not occur and will take the appropriate steps to remedy any demonstrated problems. On December 17, 1996, Brooks presented a specific case where they felt the Ameritech technician acted unprofessionally. Based on the end user's description,⁴ Ameritech was able to identify the technician in question. In

⁴See attached letter from the end user. This situation involved a poor employee attitude and misconduct, rather than any disparagement directed at a competitor.

response, the technician's supervisor discussed and reprimanded the technician relative to his behavior and warned the technician against future occurrences.

Respectfully submitted,

AMERITECH MICHIGAN



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DATED: January 15, 1997

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Application of Ameritech
Michigan Pursuant to Section
271 of the Telecommunications
Act of 1996 to Provide In-
Region, InterLATA Services in
Michigan

CC Docket No. _____

Volume 2.8:
Affidavit of Joseph A. Rogers
on Behalf of Ameritech Michigan

**BEFORE THE
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WASHINGTON, D.C. 20554**

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in Michigan)

CC Docket No. _____

**AFFIDAVIT OF JOSEPH A. ROGERS
ON BEHALF OF AMERITECH MICHIGAN**

STATE OF ILLINOIS)
) ss.
COUNTY OF COOK)

Joseph A. Rogers, being first duly sworn upon oath, deposes and states as follows:

1. My name is Joseph A. Rogers. I am Director - Information Technology for Ameritech Industry Information Services ("AIIS"), a business unit of Ameritech Services, Inc.

2. In my current position, I am responsible for the development, installation and operation of information systems and operations support systems ("OSS") used by AIIS in connection with the provision of unbundled network elements, products and services to Ameritech affiliates and to other requesting carriers and service providers. My responsibilities include implementation of federal and state telecommunications statutes and regulations as they relate to these systems.

Education and Professional Experience

3. I graduated from the University of Illinois at Springfield, Illinois with a B.A. in Computer Science in 1984. I first joined Illinois Bell Telephone Company ("Illinois Bell") in 1974 as a directory assistance operator. After serving in the United States Marine Corps from 1974 to 1978, I returned to Illinois Bell and worked as a central office technician until 1982. In 1982, I became a manager in the Switching Control Center located in Springfield, Illinois, where I was responsible for central office switch translations and central office trouble resolution. In 1984, I was transferred to the Information Technology department for Illinois Bell. My responsibilities were to manage the development, implementation and maintenance of a customer control system for Centrex service. In 1986, I was transferred to Ameritech Services, Inc. to develop the same customer control system for use throughout the Ameritech region. In 1991, I became a Consulting Systems Engineer with Ameritech Services, Inc., responsible for consulting with senior management on the use of Information Technology. I assumed my current position in 1993.

Purpose of Affidavit

4. The purpose of my affidavit is to describe Ameritech's ability to provide requesting telecommunications carriers with unbundled, nondiscriminatory access to its OSS functions. Generally speaking, these OSS functions are the business functions supported by Ameritech's databases and information which ensure that pre-ordering, ordering, provisioning, maintenance and repair, and billing for unbundled network elements and resold telecommunications services ("resale services") are performed accurately and efficiently. In accordance with the applicable FCC requirements, and as I describe in further detail below,

Ameritech currently provides requesting carriers nondiscriminatory access to these OSS functions.

5. I will address two key elements regarding Ameritech's compliance with its OSS obligations. First, Ameritech's OSS function interfaces are already being made available to all requesting telecommunications carriers today. I refer to this element as "operational readiness." Second, there is sufficient capacity built into the OSS interfaces, and the OSS interfaces are expandable on a timely basis, so that Ameritech can rapidly respond to changes in marketplace demand. I refer to this element as "capacity readiness."

6. With respect to the operational readiness of Ameritech's OSS interfaces, as I discuss in more detail below, the interfaces and other functionalities necessary to provide electronic access to Ameritech's OSS functions are fully operational today. This is true for both unbundled network elements and resale services. Electronic interfaces for ordering unbundled loops from Ameritech are in use today by such carriers as MFS Intelnet of Illinois, Inc. and MFS Intelnet of Michigan, Inc. (collectively "MFS"), Consolidated Communications Telecom Services Inc. ("CCT"), and Brooks Fiber Communications of Michigan, Inc. ("Brooks Fiber"), and have been in full commercial use since April 1995. Electronic interfaces for resale service order entry have been ready for commercial use for months. I will describe in more detail Ameritech's operational readiness relative to the interfaces used by requesting carriers to access Ameritech's OSS functions, including the extensive testing that all of them have undergone. Because OSS system access for unbundled network elements is different in some respects from that for resale services, I will discuss them separately.

7. With respect to Ameritech's capacity readiness relative to these OSS functionalities, the OSS functions and interfaces have been sized so as to ensure more than sufficient capacity to meet the expected marketplace demand, as I discuss in more detail below. Among other things, I will provide specific information on the actual demand forecasts used by Ameritech to assure its OSS capacity readiness; the OSS capacity that is currently in place and planned to be installed over the next year; and Ameritech's OSS capacity tracking and planning process. In addition, I will describe how current planned capacity greatly exceeds current demand forecasts and how quickly additional capacity can be added in the event it is required.

Operational Readiness

8. The major OSS operational functions, as defined by the FCC in the First Report and Order, CC Docket No. 96-98, at ¶ 525, are as follows:

- Pre-ordering
- Ordering
- Provisioning
- Repair and Maintenance
- Billing

These functions are common to both unbundled network elements and resale services. I will separately discuss the operational readiness of the interfaces corresponding to each of these OSS functions. In addition, for ease of understanding, I will discuss the latter four OSS functions separately for unbundled network elements and for resale services.

9. The electronic interfaces required to provide access to Ameritech's pre-ordering functions for unbundled network elements and resale services are currently being made available by Ameritech to requesting telecommunications carriers. Within the pre-ordering function, there are five sub-functions:

- access to customer service records ("CSRs");
- access to telephone number selection (i.e., the ability to select and reserve telephone numbers while the end user is on-line);
- determination of feature availability (i.e., the features/services that are currently available in that end user's central office or for that prefix);
- due date selection (i.e., the ability to select an order due date and schedule any outside work required while the end user is on-line); and
- address validation (i.e., the ability to determine that a given address is valid and properly expressed).

These pre-ordering sub-functions are common to both unbundled network elements and resale services.

10. The electronic interfaces used to provide access to these sub-functions are Electronic Data Interchange ("EDI") and File Transfer. The first of these, EDI, may be described as computer-to-computer communication of basic business data, in standard formats, among firms that regularly conduct business with one another. EDI is used to give requesting carriers on-line access to CSRs, telephone number selection and due date selection. Ameritech's EDI formats are consistent with the Customer Service Order Guideline, Issue 5 of the Alliance for Telecommunications Industry Solutions ("ATIS") and

the Telecommunications Industry Forum. The second type of interface, File Transfer, electronically transfers entire files to the requesting carrier. The requesting carrier receives data at regular intervals, stores it, and accesses it as needed. File Transfer is used to provide access to feature availability and address validation.

11. With respect to ordering unbundled network elements from Ameritech, electronic interfaces are fully operational and currently in use by requesting carriers. These interfaces were thoroughly tested before they were placed in commercial operation. Ameritech is currently receiving orders for approximately 4,500 unbundled loops per month from requesting carriers on a region-wide basis, and orders for approximately 2,000 unbundled loops per month in Michigan. Over 20,000 unbundled loops have been processed via the electronic interface since April 1995, the vast majority of which were processed in the last six months.

12. The interfaces used for ordering unbundled network elements are EDI and Access Service Request ("ASR"). ASR is a standard interface that Ameritech has used since 1984 to exchange access orders with interexchange carriers ("IXCs"), and since April 1995 for order entry with respect to unbundled network elements. EDI is used for ordering unbundled local switching. ASR is used for the remaining unbundled network elements (e.g., loops and unbundled interoffice transmission facilities).

13. With respect to provisioning of unbundled network elements, electronic interfaces are fully operational and in use today. There are three sub-functions within the provisioning function: firm order confirmation, change in order status and order completion. An electronic interface for firm order confirmation (ASR) has been operational and

processing "live" transactions since April 1995. With respect to order status and order completion, there is no need for a mechanized interface, because most unbundled loop orders are coordinated with the requesting carrier. As a result, the requesting carrier is fully aware of both order status and time of completion.

14. With respect to repair and maintenance of unbundled network elements, Ameritech has developed and made available to requesting carriers an electronic interface that is fully tested and operational. The industry standard specification for this interface is T1M1, which refers to an OSI CMISE interface established by the Operations, Administration, Maintenance and Provisioning Committee of ATIS. Ameritech has used T1M1 for almost two years for purposes of exchanging repair and maintenance information related to access services with AT&T and MCI. Thus, there is no question that the interface is operational. However, as of today, all of the carriers currently purchasing unbundled loops are using a manual interface for repair and maintenance activities. These carriers prefer the manual interface because their volume of trouble reports has not reached a level which would warrant mechanization at their end.

15. With respect to billing interfaces for unbundled network elements, billing for unbundled loops is provided through Ameritech's Carrier Access Billing System ("CABS"). Ameritech has used the CABS system since shortly after divestiture to bill IXC's for carrier access charges, and since April 1995 to bill requesting carriers for unbundled loops.

16. All of the foregoing unbundled network element OSS interfaces have been up and running with "live" customer transactions (either competitive local exchange carrier

("CLEC") or IXC) for many months without system problems. In addition, these interfaces were thoroughly tested before they were placed in commercial operation.

17. Although Ameritech, to date, has received orders from requesting carriers only for unbundled loops and circuits for end office integration, the same OSS interfaces used for unbundled loops and circuits are available for unbundled interoffice transmission facilities and other transport-based network elements. Access to OSS functions for unbundled local switching ports is available through the same interface used for resale services (EDI).

18. The electronic interface for access to order entry systems associated with resale services, EDI, has been available for use by carriers since February 1996. The interface has been thoroughly tested and is operationally ready.

19. Until recently, requesting carriers purchasing resale services from Ameritech were using a manual ordering process for their regular operations. The carriers' use of this manual process reflected the small volume of orders which they placed each month, which tended to make the electronic interface less attractive from a cost/benefit perspective. However, Communications Buyers Group ("CBG"), Network Recovery Service and USN Communications, Inc. ("USN") recently shifted to use of the electronic interface.

20. I also should note that during the OSS carrier-to-carrier interface testing for resale services that has been performed with AT&T since August 1996, "live" customer accounts (primarily accounts of AT&T employees) have been processed over the electronic interface and converted to AT&T accounts.

21. The electronic interface for the provisioning function associated with resale services (EDI) is operational. Requesting carriers can electronically receive the necessary information relevant to firm order confirmation, order status and order completion today.

22. With respect to Ameritech's repair and maintenance interface for resale services, the situation is similar to what I described earlier for the unbundled network element repair and maintenance interface. Ameritech has developed and made available an electronic interface for repair and maintenance activities associated with resale services that is fully tested and operational (T1M1). However, at the present time, the carriers who purchase Ameritech's resale services use a manual, rather than electronic, interface for their repair and maintenance requests associated with those services.

23. Ameritech's interface for resale services billing functions has been operational since February 1996. Ameritech has been providing daily usage feeds and sending bills to carriers purchasing resale services, such as USN and MFS, since April 1996. The interface for transmitting daily usage is known as Exchange Message Record ("EMR"). EMR is based on specifications developed by the Ordering and Billing Forum Committee of ATIS, and is widely used to transmit usage data. Ameritech has been using EMR for years. The interface for resale services billing data is the Ameritech Electronic Billing System ("AEBS").

24. In terms of the resale services billing function, there is no difference between resold lines processed on a manual basis and resold lines processed on an electronic basis once the initial order has been entered. The facts that (i) service orders for approximately 11,000 resold lines have been successfully manually processed by Ameritech since March 1996, (ii) these orders are being properly billed, and (iii) the carriers are receiving the

necessary bill detail to bill their own end users, all demonstrate that the OSS interface for resale services billing functions is operationally ready.

25. The electronic resale interfaces have been the subject of extensive internal testing and carrier implementation testing with AT&T, USN, CBG and Network Recovery Services. All of these tests were successful.

26. Extensive internal testing was performed to assure that the order entry interface and all systems associated with the order entry process functioned as planned prior to putting the resale order entry interface into operation in February 1996. This internal testing consisted of two primary activities.

27. First, testing was performed on the mechanized (i.e., electronic) order subsystem. This subsystem represents the only unique piece of software needed to facilitate resale services order entry by requesting carriers. The rest of the interface consists of pre-existing interfaces with Ameritech's operating systems and the EDI mainframe computer that Ameritech has been using for years for purchasing and electronic funds transfer functions. The mechanized order subsystem was tested to assure that the resale services order entry system could accept manually created or electronically created EDI orders and in turn create Ameritech service orders or present the order to a service representative for manual intervention. Tests were also performed to assure that incomplete or inaccurate orders would not be completed. The subsystem was successfully tested in January 1996.

28. Second, an integration test was performed to assure that electronic (EDI) resale service orders could be (a) received, (b) input into the underlying Ameritech OSS, (c) provisioned and (d) properly billed. Ameritech used a testing approach that created test

cases that would mimic the range of resale orders that could be expected when the system was put into production. Thus, the test environment mirrored the production or marketplace environment. Ameritech sampled actual customer accounts to create test orders for the testing environment. These test orders were then processed against real accounts and progress was monitored as the orders progressed through the system. Of course, these test orders were identified as such within the system to ensure that no actual customer account was impacted by the test process. The overall results of the integration test were very successful. Although there were some errors, none of them revealed a design flaw and all were quickly resolved.

29. Because there have been no customers ready to make high-volume use of the electronic order entry interface for resale services, Ameritech has continued to test the electronic ordering system in parallel with the processing of manual orders. Service representatives sample actual resale orders received manually and process them on a mechanized basis for purposes of monitoring their flow through the mechanized system. That effort continues today. Furthermore, all manual orders are processed through the mechanized system for purposes of order tracking and administration. In addition, as I mentioned above, implementation testing has been performed with AT&T, USN, CBG and Network Recovery Services.

30. From Ameritech's perspective, the implementation testing performed with these requesting carriers provided further confirmation that its OSS interfaces and downstream systems for resale services operate properly. Ameritech initially encountered some minor errors that were attributable to the interface. However, they were all resolved

within days and there were no "service affecting" errors. A service affecting error is one that would adversely affect a customer's service (e.g., an error causing a material delay in the change-over of the account).

31. For illustrative purposes, it may be helpful to describe the results of the implementation testing of Ameritech's resale services OSS interface conducted with AT&T. However, I should first explain the results that one would expect to see in a test of this kind. Whenever systems from two different companies exchange data over an electronic interface for the first time, it is assumed that some minor "syntactical" errors will occur. A syntactical error occurs when the format of the message does not meet specifications. An example of such an error would be the requesting carrier putting data in the wrong field of an order. To minimize these kinds of errors, Ameritech offers to meet with requesting carriers to review their implementation of Ameritech's OSS interfaces before any data is actually sent over them.

32. In any ordering environment, some orders are processed and others are not completed. This has been Ameritech's experience with respect to orders entered by its own personnel. While it is important that any order entry system correctly processes orders that have been properly completed by the requesting carrier, it is equally important that the system does not complete orders with errors in them to ensure the integrity of downstream operations. The order entry interface is the link between Ameritech's systems that provision to and bill requesting carriers for the services that they order and the carriers' systems and databases used to bill their own end users. If Ameritech allowed errors to flow through the interface, it could adversely affect the service that Ameritech provides to a requesting

carrier's end users, the accuracy of the bill that Ameritech presents to the carrier and the carrier's ability to accurately bill the end user.

33. For example, if a requesting carrier sent Ameritech an order to add a service feature that the interface could not interpret, and that order nevertheless were processed, the carrier's end user would not get the requested service feature. Furthermore, the carrier might proceed to bill the end user for the service feature, even though the end user did not have it. The likely result would be a disgruntled end user customer and a problem between Ameritech and the requesting carrier. By identifying the error at the order entry stage and returning it to the requesting carrier, the error can be corrected before any negative consequences occur.

34. Ameritech's own internal orders are not completed in similar circumstances. However, these uncompleted internal orders are not "returned" to anyone. The system simply indicates an error and requires that the error be corrected before the order is processed.

35. The implementation testing of Ameritech's resale services OSS interface that was conducted with AT&T was separated into four phases. The first phase was connectivity testing. In that phase, the ability to send and receive orders between the two companies' OSS was tested. Once this phase was completed and orders passed between the two companies, transaction content testing was performed to assure that order content was correct. This was accomplished through the electronic exchange of test orders. Once this second phase was completed, end-to-end testing was performed to assure that AT&T resale services test orders could flow completely through the system. The first three test phases,

i.e., connectivity, transactional and end-to-end testing, were completed in early October 1996. The fourth phase of testing, production testing, began on October 7, 1996.

36. Attached as Schedule 1 to my affidavit is a summary of the resale services orders Ameritech received from AT&T between October 7, 1996, when production testing started, and November 26, 1996. During this period, AT&T sent Ameritech 157 resale services orders. Of the 157 orders, 64 were completed, 3 were pending and were subsequently completed, and 90 could not be completed. AT&T was aware of the disposition of each of these orders because it received coded messages that informed AT&T that an order had been completed or could not be completed. These coded messages also informed AT&T of the deficiencies in the orders. Of the 90 orders that could not be completed, 79 could not be completed because of AT&T's errors.

37. Turning to the issue of coordination with respect to requesting carriers' use of Ameritech's OSS interfaces, Ameritech has provided requesting carriers with the information that they need to configure their systems to operate in tandem with Ameritech's OSS. Attached as Schedule 2 to my affidavit are confidential and proprietary specifications for Ameritech's OSS interfaces which have been shared with requesting carriers and are available to others, provided that they enter into appropriate agreements protecting the confidentiality of these materials. In addition to this information, Ameritech has created training manuals and conducts training programs for requesting carriers that want to purchase its resale services or unbundled network elements. Ameritech routinely sends experienced personnel to requesting carriers' premises to explain its OSS and provides hands-on "walk-throughs" of the service order process and other processes. Ameritech has also prepared

extensive documentation that explains each of its OSS processes. This documentation is updated on a regular basis to keep it current. Every effort has been made to make the OSS interfaces and processes as simple and effective as possible.

Capacity Readiness

38. In October of 1996, for purposes of determining the current capacity and planned capacity expansions of its OSS functions and interfaces, Ameritech utilized actual demand forecasts from requesting carriers and its own internal projections. These projections were used as part of a three-pronged demand estimation process, as Mr. Mickens describes in his affidavit, which was used to design and size the OSS functions and interfaces.

39. Attached as Schedule 3 to my affidavit is a matrix which provides an overview of Ameritech's OSS readiness from a capacity perspective. It lists for each OSS function and sub-function:

- the electronic interfaces Ameritech will use to provide requesting carriers access to each OSS function and sub-function;
- the planned monthly capacity for those electronic interfaces for each quarter in 1997;
- the estimated demand for those electronic interfaces for each quarter in 1997;
- the time it will take to add additional electronic capacity per function and sub-function:

- the monthly capacity Ameritech has available to permit manual intervention on an electronic transaction when it is necessary to handle that particular transaction for each quarter in 1997;
- the estimated demand for those manual interventions for each quarter in 1997; and
- the time it will take to add additional manual capacity per function and sub-function.

40. An explanation of the acronyms and abbreviations used in the matrix may be helpful. The acronyms in the column labeled "Interface" refer to the interface or data format used for that particular function or sub-function. The next five columns across the matrix show the planned monthly capacity and estimated monthly demand for each of the OSS function and sub-function interfaces (in thousands) on a quarterly basis and on a cumulative basis for 1997. The figures preceded by a "C" represent capacity and the figures preceded by a "D" represent forecasted demand for the region as a whole. The difference between the "C" and "D" figures represents spare capacity that will be available in the event that actual demand outstrips forecasted demand.

41. Using resale order entry as an example, the estimated monthly resale (i.e., EDI) demand for the first quarter of 1997 is 34,000 orders. The planned capacity, however, would accommodate 100,000 orders per month, leaving spare capacity for an additional 66,000 orders. This means that Ameritech's forecasts would have to be off by more than 300 percent for resale order entry capacity to exhaust during the first quarter of 1997.

42. In determining how much spare capacity to install, Ameritech's approach was to size its OSS functions and interfaces using at least a six-month lead time. In other words, Ameritech has installed enough capacity as of January 1, 1997 to more than meet expected demand six months later (i.e., on July 1, 1997). Similarly, the July 1, 1997 capacity will be sized to more than satisfy anticipated end-of-year demand (i.e., on December 31, 1997).

43. Ameritech incorporated specific forecasts from requesting carriers, to the extent that such forecasts were provided to Ameritech, into the demand estimation process that it used to size its OSS interfaces. Ameritech asked all of the carriers that could be expected to use these interfaces in 1997 to provide both a "rolling" six-month demand forecast and monthly updates. MFS and USN provided such forecasts. AT&T provided some estimates of annual resale demand during Section 251 negotiations with Ameritech based on hypothetical wholesale pricing scenarios. Other carriers, in particular MCI and Sprint, provided no demand information whatsoever. I discuss below the specific capacity planning assumptions for each OSS function used to develop the capacity figures on Schedule 3.

44. Pre-Ordering. Capacity planning for customer service records ("CSR") was based on Ameritech's current average of 1.75 telephone lines per customer order. When a CSR request is made, all lines on the account are provided. Capacity planning for telephone number requests was based on Ameritech's current average that 15% of all customer orders require a telephone number. Using this factor is conservative, since many resale orders are likely to be assumptions of existing Ameritech accounts and, therefore, will not require a new telephone number. Capacity planning for due date assignment was based on